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14 **Attorneys for Plaintiffs**

15 UNITED STATES DISTRICT COURT
16 CENTRAL DISTRICT OF CALIFORNIA
17 WESTERN DIVISION

19 ADIDAS AMERICA, INC., and
20 ADIDAS AG,

Plaintiff,

21 v.

22 WAH LEI FOOTWEAR (U.S.A.)
23 CORPORATION, FU JU (U.S.A.)
24 GROUP INC., LA DISCOUNT SHOES,
25 SUNNY SHOES CORP., and TOP
SHOES, INC.

26 Defendants.

Case No.: CV08-04969-JFW (JTLx)

**PERMANENT INJUNCTION ON
CONSENT (REGARDING WAH LEI
FOOTWEAR (U.S.A.)
CORPORATION)**

PERMANENT INJUNCTION ON CONSENT

1 This Court, having considered the Complaint on file in this action, and
2 Defendant Wah Lei Footwear (U.S.A.) Corporation (“Wah Lei”), a California
3 corporation, having consented to the terms of the judgment and permanent
4 injunction set forth below, this Court hereby finds as follows:

5 1. Plaintiff adidas AG owns and adidas America, Inc. extensively uses the
6 Three-Stripe trademark (the “Three-Stripe Mark”), which is covered by valid U.S.
7 Trademark Registration Nos. 870,136, 1,815,956, 1,833,868, 2,016,963, 2,058,619,
8 2,278,589, 2,278,591, 2,284,308, 2,909,861, 2,999,646, 3,029,127, 3,029,129,
9 3,029,135, 3,087,329, and 961,353 (the “Trademark Registrations”). Copies of the
10 Trademark Registrations are attached hereto collectively as Exhibit A.

11 2. On July 29, 2008, adidas filed a complaint in the instant action claiming,
12 *inter alia*, that Wah Lei advertised, distributed, offered for sale and sold footwear
13 bearing four parallel stripes in a manner that infringes adidas’s rights in and dilutes the
14 distinctive quality of adidas’s Three-Stripe Mark (the “Disputed Footwear”). A
15 photograph of a representative example of the Disputed Footwear is attached hereto as
16 Exhibit B.

17 3. The Court has jurisdiction over the subject matter of this action and over
18 Wah Lei and venue in this action is proper in this judicial district.

19 **IT IS HEREBY ORDERED** that:

20 1. Wah Lei and all its agents, officers, employees, representatives,
21 successors, assigns, attorneys, and all other persons acting for, with, by, through, or
22 under authority from Wah Lei, or in concert or participation with Wah Lei, and each
23 of them, be PERMANENTLY ENJOINED and RESTRAINED, from:

24 a. manufacturing, selling, offering for sale, advertising, promoting,
25 distributing or displaying the Disputed Footwear;
26

